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## State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

Kenneth D. Smith  
BRAC Environmental Coordinator  
Naval Air Warfare Center, Aircraft Division  
P.O. Box 7176  
Trenton, NJ 08628-0176

Re: Work Plan for the Barometric Well Decommissioning

Dear Mr. Smith:

The New Jersey Department of Environmental Protection (NJDEP) is in receipt of the Work Plan for the Barometric Well Decommissioning dated July 29, 1997 and received on August 25, 1997. Upon review of the subject document, NJDEP has a few comments. The comments have been attached for your convenience.

If you have any questions regarding this letter, please do not hesitate to contact me at (609) 633-1494.

Sincerely,

Donna L. Gaffigan, Case Manager  
Bureau of Federal Case Management

Enclosure

C: William Hanrahan, BGWPA  
Steven Byrnes, BEERA  
William Lawler, USEPA  
Edward Boyle, NorthDiv

## Work Plan for the Barometric Well Decommissioning

July 29, 1997

1. Section 1.1 - Work Description, pg. 1

a. In the second paragraph it is stated that the floor drains will be pressure flushed until visibly clean. It is unclear how "visibly clean" will be determined if the drains are below the floors and the washwater will be discharged into the Barowell.

18" b. A figure should be provided that shows where on the site the damaged 24-inch stormwater sewer line is located.

2. Section 1.3 - Waste Description, pg. 6

It is stated that the flush water (collected in the Barowell) will be tested for hazardous constituents and then either pumped to the on-site wastewater treatment plant or drummed for off-site disposal. The Work Plan should also state the concentration limits that will be used to make the determination as to whether the flush water will be treated or disposed. In addition, the Navy should contact the local sewerage authority to confirm that such a discharge is allowed its permit, before any discharge occurs.

3. Section 1.5 - Performance Requirements, pg. 6

Again, as is mentioned in Comment No. 1, It is unclear how "visibly clean" will be determined if the drains are below the floors and the washwater will be discharged into the Barowell.

4. Section 1.6.2 - Phase One - Inactive Building Floor Drain .... pg. 7

It is stated that the Navy will be responsible for flushing and sealing sink drains, eye wash drains, etc. Although it may not be appropriate in a contractor's Work Plan, the NAVY should provide to NJDEP the procedure to be followed for the sink drains, etc. and a schedule. Presumably, this work will be done concurrently with the contracted work and will occur before the Barowell is cleaned out.

5. Section 1.6.3.2 - Task Two, pp. 7-8

a. In the first paragraph, it is stated that the Barowell hut will be removed for disposal. Be advised that prior to disposal, the Navy must complete all preservation or recordation activities required by the Historic Preservation Act.

b. For safety reasons, excavated soil should be placed at least 2 feet away from the edge of any open excavation.

c. It is stated that excavated soils will be visually inspected for staining, screened with a PID and observed for odors. Since mercury is cited as a potential contaminant in the drain lines and traps, the Navy must state how the excavated soils be screened for possible mercury contamination.

d. It is stated that the influent pipelines to the barowell will be exposed so they can be isolated and cut. In accordance the New Jersey Technical Requirements for Site Remediation (Tech Regs), specifically, N.J.A.C. 7:26E-3.9(a)5 (below grade piping), 7:26E-3.9(d)1 (floor drain systems) and 7:26E-3.9(e)3i (below grade waste disposal systems), an investigation of the soils around the influent lines is required. For the sake of expediency in closing the Barowell, a separate submittal will be acceptable to address this issue. It will likewise be acceptable to incorporate existing data into an influent pipeline investigation.

e. The last paragraph of this section states that the excavation around the barowell will be backfilled. There is no mention of sampling the bottom of the excavation prior to backfilling. In accordance with the Tech Regs sections mentioned above, soil samples must be collected from this area of concern. It is recommended that the soil be analyzed for TCL and TAL parameters. This data, combined with any existing data will justify any future actions or no further action at the Barowell (aka Installation Restoration Program Site 8).

f. In accordance with the Tech Regs, specifically, N.J.A.C. 7:26E-6.2(b) and 7:26E-6.4 (d) the excavated soils must be analyzed prior to reuse. Therefore, prior to reuse as backfill around the Barowell as proposed, the excavated soils should be analyzed for TCL and TAL parameters and submitted to NJDEP for review.

6. Section 1.6.3.3 - Task Three, pg. 8

a. The third paragraph states that a visual inspection for leaks will be performed by representatives of the contractor, the Navy, and NJDEP. This must be revised for two reasons. First, neither the contractor nor the Navy can obligate NJDEP to perform activities in a work plan. Second, the Bureau of Federal Case Management does not perform confined space entries, nor deems it necessary for any NJDEP representative to do so. The Work Plan shall be revised to address this issue.

b. The last paragraph states that the roof and housing will be replaced over the closed Barowell, however, on page 7, it states that the hut will be disposed. This discrepancy must be resolved, as well as address Comment No. 6a, above.

7. Section 1.6.4 - Phase Three - Stormwater Sewer Line Repair, pg. 9

It must be stated in the Work Plan that the borehole/monitoring will be abandoned by a licensed well driller in accordance with NJDEP regulations. In addition the soil in this area must be investigated in accordance with the Tech Regs, specifically, N.J.A.C. 7:26E-3.9(d)4 (storm sewers).